

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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PAULETTE VAUGHN and JOY VAUGHN,

CV-01-7937(ILG)(MDG)

Plaintiffs,

-against-

CONSUMER HOME MORTGAGE CO.,
INC. *et al.*,

**DECLARATION OF
RICHARD J. WAGNER, ESQ.
IN OPPOSITION TO MOTION
FOR SUMMARY JUDGMENT**

Defendants.

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RICHARD J. WAGNER, ESQ, declares the following to be true under penalty of perjury pursuant to 28 U.S.C. Sec. 1746:

1. I am the Director of Litigation of Brooklyn Legal Services Corporation "A", one of the attorneys for plaintiffs in this action.

2. A Motion for Summary Judgment has been made on behalf of the defendant Martin Silver and has been served upon plaintiffs Paulette Vaughn and Joy Vaughn. Plaintiffs submit the within Declaration and the attached Exhibits A-F as their opposition to said motion.

3. In further support of their Opposition to defendant Martin Silver's Motion for Summary Judgment, plaintiffs incorporate herein the 21-Day Demand letter pursuant to FRCP Rule 11(c)(1)(A) dated August 9, 2005 (the "21-Day Demand Letter") hereto as Exhibit "G" and incorporates it herein by reference.

Dated: New York, New York
August 24, 2005

/s/ Richard J. Wagner
RICHARD J. WAGNER